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Attorneys for Defendant, **BRANT BLAKEMAN**

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

CORY SPENCER, an individual;  
DIANA MILENA REED, an individual;  
and COASTAL PROTECTION  
RANGERS, INC., a California non-profit  
public benefit corporation,

Plaintiffs,

vs.

LUNADA BAY BOYS; THE  
INDIVIDUAL MEMBERS OF THE  
LUNADA BAY BOYS, including but not  
limited to SANG LEE, BRANT  
BLAKEMAN, ALAN JOHNSTON AKA  
JALIAN JOHNSTON, MICHAEL RAE  
PAPAYANS, ANGELO FERRARA,  
FRANK FERRARA, CHARLIE  
FERRARA, and N.F.; CITY OF PALOS  
VERDES ESTATES; CHIEF OF  
POLICE JEFF KEPLEY, in his  
representative capacity; and DOES  
1-10,

Defendants.

**CASE NO.: 2:16-CV-2129-SJO-RAO**

Assigned to Courtroom: 1

The Hon. S. James Otero

**DECLARATION OF PETER H.  
CROSSIN IN SUPPORT OF BRANT  
BLAKEMAN'S MOTION TO  
DISMISS COMPLAINT**

**[Fed. Rules Civ. Proc., Rule 12(b)(1)]**

**[Filed concurrently with Notice of  
Motion and Motion to Dismiss  
Complaint; and (Proposed) Order  
Lodged Herewith]**

**Date: August 1, 2016**

**Time: 10:00 a.m.**

**Place: Courtroom No. 1**

**Second Floor**

**312 North Spring Street  
Los Angeles, CA 90012**

**Action Commenced: March 29, 2016**

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**DECLARATION OF PETER H. CROSSIN**

I, PETER H. CROSSIN, declare as follows,

1. I am an attorney at law duly licensed to practice before all of the Courts of the State of California, and am partner in the law firm of Veatch Carlson, LLP. As such, I am fully familiar with the facts and circumstances of this action, and, if called as a witness, would and could competently testify to the following facts hereto.

2. Prior to meeting and conferring with Plaintiffs' counsel Kurt Franklin and Samantha Wolff as required by Local Rule 7.3, I forwarded to counsel for Plaintiffs an email detailing the issues/law supporting a motion to dismiss based on my client Brant Blakeman's status as an "individual" defendant.

3. On June 1, 2016, I and counsel for individual defendants Michael R. Papayans and Alan Johnston, held an extensive meet and confer with Plaintiffs' counsel Kurt Franklin and Samantha Wolff as to why a Motion to Dismiss as to my client is warranted. At the conclusion of the conference we all agreed that we would consider each parties' arguments and positions. This instant motion is based, in part, on the meet and confer conference of June 1, 2016.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Los Angeles, California, on June 17, 2016.

/s/ Peter H. Crossin  
**PETER H. CROSSIN**

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